

DeMaria, Eva

From: MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>
Sent: Tuesday, July 21, 2015 12:09 PM
To: DeMaria, Eva
Cc: Sheldrake, Sean; Michael Allen (allenmc@cdmsmith.com); LIVERMAN Alex
Subject: RE: Uplands sites suggested for briefings

Hi Eva,

Yes, we are looking forward to the meeting and discussions. I will put a draft agenda together next week. I met with the Sulzer PM yesterday and should be able to carry the discussion. It looks like there is confusion on the Sulzer riverbank and DEQ's positions that hopefully the discussions will clear up.

Matt

From: DeMaria, Eva [mailto:DeMaria.Eva@epa.gov]
Sent: Tuesday, July 21, 2015 11:27 AM
To: MCCLINCY Matt
Cc: Sheldrake, Sean; Michael Allen (allenmc@cdmsmith.com); LIVERMAN Alex
Subject: RE: Uplands sites suggested for briefings

Matt—

I'm hoping we can get a good discussion going regarding RP (with CDM's help!). As for Sulzer, we want to discuss the disagreement over characterization of the river bank. If I understand DEQ's comments correctly, DEQ required soil sampling at the top of the bank above MHW and found PCBs above JSCS SLVs and therefore assumed that these concentrations are representative of exposed bank material below the MHW. DEQ then decided to exclude the bank erosion pathway because PCB concentrations were detected at less than 10x the PRG (yet above the PRG). Where did this adjustment factor originate? In addition it appears that because EPA has not identified SDUs in the vicinity of Sulzer that concentrations above PRGs do not necessarily indicate site-wide risk? These conclusions don't make sense to me and perhaps DEQ can provide further clarification. Thanks.

Eva

From: MCCLINCY Matt [<mailto:MCCLINCY.Matt@deq.state.or.us>]
Sent: Thursday, July 16, 2015 2:29 PM
To: DeMaria, Eva
Cc: Sheldrake, Sean; Michael Allen (allenmc@cdmsmith.com); LIVERMAN Alex
Subject: RE: Uplands sites suggested for briefings

Hi Eva,

Sounds good. Scott Manzano the PM for Rhone Poulenc will not be able to join us, but Dave Lacey will be able to meet with us. Attached are comments on your draft comments on the DEQ Rhone Poulenc RI Addendum. It will be good to discuss your thoughts/concerns on the addendum. *Note that there are some asks in our attached comments for our meeting.* Lets plan on covering the Rhone Poulenc discussion on 7/28.

Mark Pugh the PM for Sulzer is out of the office on the 28th and 29th, but I will premeet with him and try to carry the conversation. Are their particular EPA comments on Sulzer that you want to focus on?

Matt

From: DeMaria, Eva [<mailto:DeMaria.Eva@epa.gov>]
Sent: Wednesday, July 15, 2015 3:47 PM
To: MCCLINCY Matt
Cc: Sheldrake, Sean; Michael Allen (allenmc@cdmsmith.com)
Subject: RE: Uplands sites suggested for briefings

Matt-

We'd like to reserve some time to also discuss with DEQ our differences of opinion on Rhone Poulenc and Sulzer, based on the recent email exchange. Would you be able to arrange for the DEQ project managers to be there on either the 28th or 29th? Also, we've confirmed that Mike Allen/CDM will be teleconferencing in and has already arranged a meet-me-line (7/28 12:30-3:30 pm and 7/29 8-11:30 am). We just need a workable speakerphone. (Ha!) If we need more time, I can make myself available after 3:30 pm on 7/28 and earlier on 7/29. Thanks!

Eva

From: MCCLINCY Matt [<mailto:MCCLINCY.Matt@deq.state.or.us>]
Sent: Monday, July 13, 2015 11:39 AM
To: DeMaria, Eva
Cc: Sheldrake, Sean; Michael Allen (allenmc@cdmsmith.com)
Subject: FW: Uplands sites suggested for briefings

Hi Eva.

Thanks for the focused list. We will get PMs and items together for these and we are providing a quick rundown of the sites and few things we recently received or hadn't passed along for you to digest in the meantime. We'll fill you in on history and where it all fits in the fuller context when we meet up. This will make for a light schedule, so we will fill in with a focus on groundwater throughout the Harbor and also the details on a few other "yellow" sites.

Container Mgt – Has been lagging for a long time. The site owner is responsible for the cleanup, which is different than the site operator and there is animosity between them. The site operator is currently looking for an alternative location to move to. Rich put the site on the "worry list" and when we communicated this to the site (sharing his email), they immediately took a more serious effort. We are concerned about stormwater on the site because there are relatively high concentrations of PCBs and pesticides in soils and the on-going operator reconditions 55-gallon drums here. The site is largely unpaved and there is a lot of potential trackoff to City streets with storm lines to OF 18 and the surrounding sites have completed or are nearing completion of source control efforts so we don't want them to become recontaminated. There has not been good documentation yet and only minor band-aid actions (like new gravel around catch basins) to date. DEQ rejected the latest proposal to install a sand filter for a small portion of drainage (Rich provided CDM comments on this). We requested comprehensive stormwater control including paving and pipe replacement/repair. The first attachment is the latest proposal, which is more comprehensive and has an aggressive schedule, which is likely not possible given City piping and permitting interactions... But they are definitely moving in the right direction. We'll bring a map and walk you through the site highlights. We'll forward the site eval and proposal when we get it.

Calbag Front – Alex recently inherited this one when the PM retired. It goes by the name of BDC Properties now and has a tenant with vacuum pumper trucks. We reopened the NFA (or at least required stormwater pathway re-evaluation) when the City data indicted PCBs were still present. We have been working with the site on source tracing and controls. They have struggled with meeting storm event sampling protocols and consistent consultants. The second attachment is the most recent "work plan" they've been implementing since last October. We'll check-in with them and get the current status before we meet.

Gunderson – Alex also inherited Gunderson last week. They are delinquent on a few submittals and she is trying to schedule a meeting to get up to speed on what deliverables we can expect when and how to best go forward from here. They just submitted a groundwater monitoring report, which represents the 2nd quarter of 4 planned to monitor for rebound after shutting down the treatment system dealing with VOCs from a past release (which extends onto the Lakeside property to the north). We'll try to get that report on our ftp site for you and send a link. They have done a lot to address stormwater and are currently planning to implement some additional measures to comply with the Tier II corrective action requirements for the 1200Z permit. Alex is coordinating with the City and will meet with Gunderson to make sure that source control issues are also addressed. We'll will bring maps and info to explain the site and what's been done and what is planned when we meet.

Schnitzer – Jim Orr presented to you on this one at our last visit. Given that it's complicated and lots of info runs together at this on-boarding stage, let's keep some time to re-visit and answer your questions. Alex and Jim will have also met with the City on some site discovery for the other parcels within the SBIP, so we can give you the details on that...

Wirfs – Is just getting started, but we'll tell you what we know...

From: DeMaria, Eva [<mailto:DeMaria.Eva@epa.gov>]
Sent: Monday, July 13, 2015 9:49 AM
To: MCCLINCY Matt; LIVERMAN Alex
Cc: Sheldrake, Sean; Michael Allen (allenmc@cdmsmith.com)
Subject: Uplands sites suggested for briefings

Matt and Alex-

We'd like to have at least the following sites covered in the next meeting (July 28 pm, July 29 am). Mike Allen from CDM Smith will be teleconferencing in and sending a meet-me-line invite, if he's available. Thanks.

Eva

1. Container Management ESCI 4784 – stormwater – listed as “Uncontrolled” and scheduled for source control decision (SCD) in 2016, the CDM/EPA review in April 2015 noted several documents not available and either a briefing or a DEQ file review was recommended. Upcoming or ongoing activity includes implementation of additional SCMs to control stormwater discharges at this site are a priority. Follow up to review SCE documentation for this site and ensure that SCMs are implemented and documentation in place for a SCD in 2016.
2. Schnitzer Steel ESCI 2355 – stormwater – There seems to be fairly significant activity at this site, but no reviews in CDM inventory. Listed as uncontrolled pathway and a high priority by DEQ. EPA has not reviewed stormwater characterization data and information on SCMs.
3. Gunderson, ECSI 1155- Groundwater/Stormwater and riverbank to be integrated with inwater remedy. DEQ has listed as “High” priority and activity is ongoing. This site has the highest EPA index and EPA has only reviewed FS documents related to the riverbank SCM. Information and/or reviews for groundwater and stormwater pathways to support review of the upcoming SCD in 2016.
4. Calbag Metals Front Street ESCI 2454 - listed as “Uncontrolled” with additional SCM needed, and scheduled for SCD in 2015. There are no reviews in CDM inventory, although raked as “medium” concern, this site has potential to be addressed and SCD completed with EPA reviews.
5. Wirfs Property, ECSI 242 - Groundwater/Stormwater - DEQ lists both groundwater and stormwater pathways as uncontrolled. Now is optimal timing to have a briefing, obtain information for groundwater and stormwater pathways to support the upcoming SCD in 2015.